

ALSTON & BIRD LLP

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424

404-881-7000
Fax: 404-881-7777
www.alston.com

Lee A. DeHihns, III

Direct Dial: 404-881-7151

E-mail: lee.dehahns@alston.com

July 20, 2009

Michael Hom, Environmental Engineer
Clean Water Enforcement Branch
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

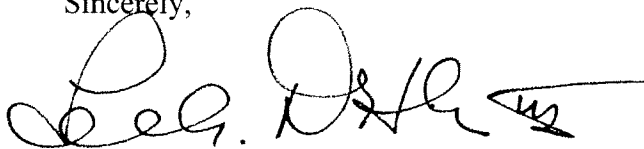
**Re: Information Request – Section 308 of the Clean Water Act - Dalton
Utilities Land Application System**

Dear Mr. Hom:

Enclosed with this letter is the analytical data response of Dalton Utilities to EPA's May 20, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosures include a July 20, 2009 letter with a certification signed pursuant to the Request and the information responsive to Paragraph 3 of Enclosure A and to Enclosure C. The list of analytes in Enclosure C was revised pursuant to the June 16, 2009 meeting between representatives of Region 4 and Dalton Utilities and your June 17, 2009 email message to Mr. Cope as described in Mr. Cope's June 29, 2009 letter to you.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee A. DeHihns, III", with a stylized flourish at the end.

Lee A. DeHihns, III

LAD:gba
Enclosures

LEGAL01/13110542v4



July 20, 2009

Mr. Michael Hom, Environmental Engineer
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Information Request – Section 308 of the Clean Water Act
Dalton Utilities Land Application System (LAS) Permit No. GA02-056

Dear Mr. Hom,

Per our communication dated June 29, 2009, please find enclosed the Analytical Report for Fluorochemical Characterization of Aqueous and Solid Samples, MPI Report No. L0018099. The enclosed report details the analyses, methods, and results for the samples collected per the aforementioned Information Request.

Dalton Utilities is conducting a drinking water well survey to identify drinking water wells in the immediate vicinity of the Land Application System (LAS) that have the potential to have been impacted by the ground water coming from the LAS. Approximately 86 residents in this area are being contacted and wells used for drinking water are being sampled. Once this analysis has been conducted, we will develop an appropriate plan of action and advise you of it.

Additionally, Dalton Utilities is evaluating its composting operation. Samples have been collected and are currently being analyzed using the Toxicity Characteristic Leaching Potential (TCLP) test to determine the leaching potential, if any, of PFOA/PFOS from the finished compost. This testing is being performed on compost of different ages.

A potential source assessment is also being conducted by Dalton Utilities. As was stated in our correspondence dated July 9, 2009, Dalton Utilities has partnered with the Sustainability Division of the Georgia Department of Natural Resources (DNR) to investigate the current usage and potential levels of perfluorinated chemicals (PFCs) in the carpet manufacturing processes and the industrial discharges into our wastewater collection system. The Sustainability Division is currently preparing a scope of work.

Mr. Michael Hom
July 20, 2009
Page 2 of 2

Dalton Utilities is also scheduling a meeting of industrial facilities permitted through our Pretreatment Program to facilitate the gathering and validation of information on local PFC usage.

Further, Dalton Utilities is working with the Georgia Department of Natural Resources (DNR) to gather information on the potential impacts of PFOA/PFOS on the wildlife population, specifically deer and turkey, on the LAS. Dalton Utilities and the DNR are jointly working on a plan to obtain and analyze blood and tissue samples on the deer and turkey to determine if any consumption guidelines are warranted.

Dalton Utilities will update you as these projects proceed.

If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Don Cope
President & CEO

Enclosure

C: ~~Dr. Carol Couch, Georgia Environmental Protection Division (cover letter only)~~
~~Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)~~
Lee A. DeHihns, Esq.